

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO PUBLIC REPRESENTATIVE INTERROGATORIES (PR/USPS-T4-1 AND 3)**
(January 6, 2012)

The United States Postal Service hereby files the responses of witness Neri (USPS-T-4) to the above-listed interrogatories of the Public Representative dated December 21, 2011. Each interrogatory is stated verbatim and followed by the response. Interrogatory PR/USPS-T4-2 has been redirected to Postal Service witness Bradley for a response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
PUBLIC REPRESENTATIVE INTERROGATORIES

PR/USPS-T-4-1

Please refer to page 2 of your testimony where you state, "Through Network Rationalization, the Postal Service can adapt its network and infrastructure to current and projected economic realities. The Postal Service must significantly reduce excess capacity and cut costs across the board. "

- a. Please confirm that you use the term 'Network Rationalization' to describe removing excess capacity from the mail processing network. If not confirmed, please explain and provide a definition for the term.
- b. Please, provide empirical evidence illustrating "excess capacity" for the mail processing network. Please provide and explain all calculations and data.

RESPONSE:

a. Generally, the term is being used to refer to the process in which the Postal Service applies an analytical approach to the redesign of the mail processing and transportation network in order to increase efficiency within the organization. In this case, the efficiency increases are based upon the reduction of pieces of mail processing equipment in the fleet, total miles traveled, and total work hours paid aligned with an adjustment to service standards.

b. Please see Library Reference USPS-LR-N2012-1/44 and the forthcoming response of Postal Service witness Williams to GCA/USPS-T1-1.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
PUBLIC REPRESENTATIVE INTERROGATORIES

PR/USPS-T-4-3

Please refer to page 30 of your testimony where you state that you used a method used to estimate the staffing for support personnel that is based upon a variety of factors. Please provide a library reference (or citation to existing library reference with specific file, worksheet, and cells identified) with all the data and calculations that were used to estimate the staffing support needed in the realigned network.

RESPONSE:

Please see Library Reference USPS-LR-N2012-1/45.